

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

FAIR ISAAC CORPORATION, a)	Case No. 16-cv-1054 (WMW/DTS)
Delaware corporation,)	
)	
Plaintiff,)	
)	
v.)	Jury Trial Demanded
)	
FEDERAL INSURANCE COMPANY,)	
an Indiana corporation,)	
)	
Defendant.)	
)	

**DECLARATION OF WILLIAM WAID IN SUPPORT OF FAIR ISAAC
CORPORATION'S OPPOSITION TO FEDERAL INSURANCE COMPANY'S
MOTION TO COMPEL**

I, William Waid, declare as follows:

1. I am the Vice President and General Manager of the Decision Management Line of Business of Plaintiff Fair Isaac Corporation ("FICO").

2. I make this declaration on my own information, knowledge, and belief in support of Fair Isaac Corporation's Opposition to Federal Insurance Company's Motion to Compel.

3. [REDACTED]

[REDACTED]

4. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Dissecting the licensing agreements from these complex documents would be a significant burden.

5. FICO prices its licenses for the Blaze Advisor® software in several different ways. [REDACTED]

[REDACTED]

6. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9. I calculated the standard FICO license fees on an application basis for the applications I understand Chubb & Son, a division of Federal, has used the Blaze Advisor® software. To calculate the \$4,671,000 lost application license fee, [REDACTED]

[REDACTED]

[REDACTED]


[REDACTED]

[REDACTED]


[REDACTED]





[REDACTED]

[REDACTED]



This calculation is subject to change based on further information regarding the applications in use by Federal and the extent of Federal's use of each application.

10. I calculated the standard FICO license fees on an application basis for the applications I understand are being used in Canada and the U.K. in the same manner. Federal has disclosed that the Adapt-ABL and Evolution applications are being used in Canada and the EZER and Commercial applications are being used in the U.K. 



The standard fee for maintenance and support services was then added to reach the total of \$378,000 in lost license fees for the use in Canada and \$594,000 for the use in the U.K. This calculation is subject to change based on

further information regarding the applications in use in Canada and the U.K. and the extent of such use.

11. [REDACTED]

[REDACTED]

[REDACTED]

I declare under the penalty of perjury of the laws of the United States that the foregoing is true and correct.

Dated: February 5, 2018

s/ William Waid
William Waid